IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143 Honorable T.S. Ellis, III

Status Conference: May 21, 2021

Trial: July 12, 2021

MOTION TO SEAL EXHIBIT 1 TO DEFENDANT'S STATUS UPDATE

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting Exhibit 1 to Defendant's Status Update be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS By Counsel

/s/

Nina J. Ginsberg (#19472) Zachary Deubler (#90669) DiMuroGinsberg, P.C. 1101 King Street, Suite 610 Alexandria, VA 22314 Telephone: (703) 684-4333 Facsimile: (703) 548-3181

Email: nginsberg@dimuro.com Email: zdeubler@dimuro.com Jonathan Jeffress (#42884)

Jade Chong-Smith (admitted pro hac vice)

KaiserDillon PLLC

1099 Fourteenth St., N.W.; 8th Floor—West

Washington, D.C. 20005 Telephone: (202) 683-6150 Facsimile: (202) 280-1034

Email: jjeffress@kaiserdillon.com Email: jchong-smith@kaiserdillon.com

/s/
Mark John Mahoney (admitted pro hac vice)

Harrington & Mahoney

70 Nigagara Street, 3rd Floor

Buffalo, NY 14202

Telephone: 716-853-3700 Facsimile: 716-853-3710

Email: mjm@harringtonmahoney.com

Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May 2021, the foregoing was served electronically on counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Nina Ginsberg